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*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L.  
Madoff Investment Securities LLC and Bernard L.  
Madoff,

Plaintiff,

v.

BAM L.P., MICHAEL MANN, and MERYL  
MANN,

Defendants.

Adv. Pro. No. 10-04390 (SMB)

**DECLARATION OF DEAN D. HUNT IN SUPPORT OF TRUSTEE'S  
MOTIONS IN LIMINE NUMBERS 1 AND 2**

I, Dean D. Hunt, declare the following:

1. I am a Partner with the law firm Baker & Hostetler LLP, counsel for Irving H.

Picard, as trustee ("Trustee") for the substantively consolidated liquidation of Bernard L. Madoff

Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et seq.*, and the estate of Bernard L. Madoff (“Madoff”).

2. I submit this declaration in support of the Trustee’s Motion *in Limine* Number 1 to Admit The Plea Allocutions of Bernard L. Madoff and BLMIS Employees (“Trustee’s MIL 1”); and Motion *in Limine* Number 2 to Confirm All Requests For Admission As Deemed Admitted (“Trustee’s MIL 2”).

3. True and correct copies of the following documents are attached in support of Trustee’s MIL 1:

Exhibit 1: Plea Allocation of Bernard L. Madoff, *United States v. Madoff*, No. 09-CR-213 (DC) (S.D.N.Y. March 12, 2009), *available at* ECF Nos. 50, 63.

Exhibit 2: Plea Allocation of Frank DiPascali, *United States v. DiPascali*, No. 09-CR-764 (RJS) (S.D.N.Y. Aug. 11, 2009), *available at* ECF Nos. 11, 12.

Exhibit 3: Plea Allocation of David Kugel, *United States v. Kugel*, No. 10-CR-228 (LTS) (S.D.N.Y. Nov. 21, 2011), *available at* ECF No. 188.

Exhibit 4: Plea Allocation of Irwin Lipkin, *United States v. Lipkin*, No. 10-CR-228 (LTS) (S.D.N.Y. Nov. 8, 2011), *available at* ECF No. 288.

4. True and correct copies of the following documents are attached in support of Trustee’s MIL 2 To Confirm All Requests For Admission As Deemed Admitted:

Exhibit 5: January 5, 2015 correspondence serving Requests for Admission, and the Requests for Admission themselves

Exhibit 6: February 10, 2015 correspondence to Defendants

Exhibit 7: September 16, 2015 correspondence to Defendants

I declare under penalty of perjury that the foregoing is true and correct, pursuant  
to 28 U.S.C. § 1746 (2).

Dated: New York, New York  
November 19, 2018

By: /s/ Dean D. Hunt  
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